

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI  
WESTERN DIVISION

UNITED STATES OF AMERICA,  
*Plaintiff,*

Case No. 24-CR-00291-001-DGK

v.

ERNEST L. HALL,  
*Defendant.*

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MOTION FOR AN EXTENSION OF TIME  
TO FILE PRETRIAL MOTIONS

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COMES NOW defendant Ernest L. Hall, by and through counsel, Laura O'Sullivan, and respectfully requests this Court for an extension of time to file pretrial motions. In support of this motion, Hall offers the following in support:

1. On December 17, 2024, an indictment was filed charging Hall with one count of conspiracy to traffic firearms, in violation of 18 U.S.C. §§933(a)(1), (3) and (b); one count of engaging in firearm sales without a license, in violation of 18 U.S.C. §§922(a)(1)(A), 923(a) and 924(a)(1)(D); four counts of trafficking firearms, in violation of 18 U.S.C. §§933(a)(1) and (b); one count of felon in possession of a firearm, in violation of 18 U.S.C. §§922(g)(1) and 924(a)(8); and one forfeiture allegation pursuant to 18 U.S.C. §§924(d) and 934 and 28 U.S.C. §2461(c).
2. On December 17, 2024, an indictment was filed charging Ellison with one count of conspiracy to traffic firearms, in violation of 18 U.S.C. §§933(a)(1), (3) and (b); one count of engaging in firearm sales without a license, in

violation of 18 U.S.C. §§922(a)(1)(A), 923(a) and 924(a)(1)(D); six counts of trafficking firearms, in violation of 18 U.S.C. §§933(a)(1) and (b); one count of felon in possession of a firearm, in violation of 18 U.S.C. §§922(g)(1) and 924(a)(8); and one forfeiture allegation pursuant to 18 U.S.C. §§924(d) and 934 and 28 U.S.C. §2461(c).

3. On December 6, 2024, Hall appeared for a preliminary hearing and detention hearing. Hall was detained.
4. On December 19, 2024, Hall and Ellison appeared before United States Magistrate Judge Morris for their arraignments and the case was set on the April 28, 2025, trial docket. The Court set a deadline of January 24, 2025, for the filing of pretrial motions.
5. Discovery in this case has not yet been made available.
6. Hall, and undersigned counsel require additional time to review the discovery, adequately investigate and determine whether any pretrial motions are appropriate in this matter. This cannot reasonably be done by January 24, 2025.
7. Brandon Gibson, Assistant United States Attorney, was consulted and does not object to this extension of time.
8. Co-defendant counsel also has no objection to this extension of time, and would join in the motion.
9. This continuance is not sought for the purpose of dilatory delay but is sought in truth and fact that Hall may be afforded due process of law under the Fifth

Amendment to the United States Constitution and afforded effective assistance of counsel under the Sixth Amendment to the United States Constitution.

WHEREFORE, Hall respectfully requests this Court to extend the deadline for pretrial motions to February 21, 2025, and for whatever other relief this Court deems just and proper.

Respectfully Submitted,

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#### **CERTIFICATE OF SERVICE**

On January 21, 2025, I served this document by depositing an electronic copy of it in the Court's electronic filing system, which shall distribute notice to all attorneys of record.

/s/ Laura O'Sullivan  
Laura O'Sullivan